

Exhibit 3

Terry Reed

From: Steven S. Biss <stevenbiss@earthlink.net>
Sent: Tuesday, November 16, 2021 5:23 PM
To: Bob Moir
Cc: Terry Reed
Subject: Re: Lokhova v Halper

Bob,

I cannot tell you if Ms. Lokhova is or is not available on November 23, 2021 because she has not responded to any of my communications. In any case, I did not accept the notice of deposition for her and have no authority to do so.

I am not available on November 22, 2021. I would like to work this out with a simple written agreement that I will pay the full award with interest if the Fourth Circuit affirms.

I have had multiple deadline is the last week, and apologize for not responding. I will do so more fully tomorrow.